



State of New Jersey

Chris Christie
Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

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Kim Guadagno
Lt. Governor

David Rebuck
Acting Director

January 24, 2012

Lloyd D. Levenson, Esq.
Cooper Levenson
1125 Atlantic Avenue
Atlantic City, NJ 08401

RE: E-Marker Product; Use at Golden Nugget Atlantic City

Dear Mr. Levenson:

Your client, eMarker, LLC, has requested approval to install its electronic marker issuance and redemption system, eMarker, in the Golden Nugget Hotel and Casino ("Golden Nugget"). The Division of Gaming Enforcement ("Division") was given a demonstration of the eMarker product. The Division hereby approves the installation of eMarker at Golden Nugget subject to a field test and the additional conditions set forth herein. The field test shall last a minimum of sixty days, during which personnel from both the Division's Technical Services Bureau (Slot Lab) and Regulatory Enforcement Bureau will evaluate the performance and functionality of eMarker.

Prior to commencing actual operations during the field test, personnel from the Division's Regulatory Enforcement Bureau must conduct a surveillance inspection to ensure that the display of the eMarker handheld device will be legible to surveillance operators. Also, Golden Nugget and eMarker must also provide a certification that eMarker is compatible with and functions properly with Golden Nugget's accounting systems so as to assure that all revenue and accounting transactions are able to be properly recorded and reported. The following additional conditions must also be complied with upon the implementation of testing:



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- A. eMarker must be configured to require the signatures of two casino employees before a transaction is consummated and funds dispensed to a patron. Specifically, for table transactions, a casino supervisor and the dealer must both provide their personal identification numbers ("PINs") and electronic signatures. For slot credit transactions, a slot supervisor and the cage cashier must provide their PINs and electronic signatures;
- B. Golden Nugget staff must receive training to familiarize themselves with the new electronic credit issuance procedures, including games personnel and accounting personnel who will be responsible for utilizing the system as well as information technology personnel who may be required to address any computer issues; and
- C. During the field test period, a paper copy of each final consummated transaction must be printed in either the accounting department or the cage for reconciliation to the computer data of each transaction. Golden Nugget may effectuate this by printing the document in the cage or by using a remote printing setup. This requirement may be extended beyond the field test period.
- D. Internal control procedures must be prepared detailing the use of eMarker, with additional emphasis on the positioning of the unit so that surveillance has the opportunity to view and read all transactions.

Golden Nugget and eMarker should be aware that the Division will be adopting temporary regulations regarding electronic credit systems upon successful completion of the field test. Golden Nugget and eMarker will be required to comply with such regulations when issued. In addition, should the eMarker system become inoperable for a period of time, Golden Nugget will be permitted in its discretion to revert to a traditional credit system. Should eMarker thereafter become operable again, Golden Nugget will be responsible for ensuring the accuracy of all reports, including the combining of eMarker and traditional credit transactions if appropriate.

Please contact Deputy Chief Don Errera at 441-7529 to coordinate the installation and surveillance inspection of the eMarker product at Golden Nugget.

Lloyd. D. Levenson, Esq.
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Thank you for your attention to this matter.

Respectfully submitted,

DAVID REBUCK
ACTING DIRECTOR

By: _____


Charles Kimmel
Deputy Attorney General

GNR/cfk

c: Don Browne, Senior Vice President of Operations, Golden Nugget
David Rebeck, Acting Director
George Rover, AAG
Richard Hanzo, Chief of Investigations
Don Errera, REB
Tadd Hansen, REB
Rick Iannacone, REB
Thomas Havey, REB
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Eric Weiss, TSB
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